

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
JOSE REYES, on behalf of himself and  
all others similarly situated,

Index No.: 1:18-CV-07484-KPF

Plaintiff,

-against-

THE APOLLO THEATER FOUNDATION, INC.  
d/b/a THE APOLLO THEATER,

Defendant.  
-----X

**STIPULATION FOR DISMISSAL WITH PREJUDICE,**  
**WITH COURT'S RETENTION OF JURISDICTION**  
**TO ENFORCE SETTLEMENT AGREEMENT**

The parties, pursuant to the Federal Rules of Civil Procedure, hereby move to dismiss this action with prejudice, a resolution of all matters in dispute having been made pursuant to a Settlement Agreement executed between the parties. The parties have stipulated in their agreement that the Court retain jurisdiction to enforce the terms and conditions of the Settlement Agreement.

BABCHIK & YOUNG, LLP  
Attorneys for Defendants

LEE LITIGATION GROUP, PLLC  
Attorneys for Plaintiff



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/s/ C.K. Lee

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Dated: March 4, 2019

Dated: March 6, 2019